



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ISRAEL BOLLAG, individually and on behalf of  
all others similarly situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD., FREDY BUSH,  
SHELLY SINGHAL, J.P. MORGAN SECURITIES  
INC., UBS AG, CIBC WORLD MARKETS CORP.  
and WR HAMBRECHT & CO., LLC,

Defendants.

07 Civ. 3994 (LTS)

LEO YEN, individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

XINHUA FINANCE MEDIA LTD., FREDY BUSH,  
SHELLY SINGHAL, ZHU SHAN, GRAHAM  
EARNSHAW, ALOYSIUS T. LAWN, JOHN H.  
SPRINGER, ZHAO LI, LONG QIU YUN, J.P.  
MORGAN SECURITIES, INC., UBS AG, CIBC  
WORLD MARKETS CORP., and W.R.  
HAMBRECHT & COMPANY, LLC.,

Defendants.

07 Civ. 4046 (LTS)

**JOEL DARRAS, individually and on behalf of  
all others similarly situated,**

**Plaintiff,**

**vs.**

**XINHUA FINANCE MEDIA LTD., FREDY BUSH,  
SHELLY SINGHAL, J.P. MORGAN SECURITIES,  
INC., UBS AG, CIBC WORLD MARKETS CORP.,  
and WR HAMBRECHT & CO.,**

**Defendants.**

**07 Civ. 4144 (LTS)**

**ALTON PARTNERS, on behalf of itself and  
all others similarly situated,**

**Plaintiff,**

**vs.**

**XINHUA FINANCE MEDIA LIMITED, FREDY  
BUSH and SHELLY SINGHAL,**

**Defendants.**

**07 Civ. 4443 (LTS)**

**BRICKMAN INVESTMENTS, on behalf of itself and  
all others similarly situated,**

**Plaintiff,**

**vs.**

**XINHUA FINANCE MEDIA LTD., FREDY BUSH,  
SHELLY SINGHAL, J.P. MORGAN SECURITIES,  
INC., UBS AG, CIBC WORLD MARKETS CORP.,  
and WR HAMBRECHT & CO.,**

**Defendants.**

**07 Civ. 4719 (LTS)**

**BLOOMFIELD, INC., on behalf of itself and  
all others similarly situated,**

**Plaintiff,**

**vs.**

**XINHUA FINANCE MEDIA LTD., FREDY BUSH  
and SHELLY SINGHAL, J.P. MORGAN SECURITIES  
INC., UBS AG, CIBC WORLD MARKETS CORP.,  
and W.R. HAMBRECHT & COMPANY, LLC,**

**Defendants.**

**07 Civ. 4727 (LTS)**

**JIAJU CHU, individually and On Behalf of All Others  
Similarly Situated,**

**Plaintiff,**

**vs.**

**XINHUA FINANCE MEDIA LTD., FREDY BUSH  
and SHELLY SINGHAL, J.P. MORGAN SECURITIES  
INC., UBS AG, CIBC WORLD MARKETS CORP.,  
and W.R. HAMBRECHT & CO.,**

**Defendants.**

**07 Civ. 6145 (LTS)**

**STIPULATION AND ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to the captioned actions, that:

1. The Complaints in each of the above-captioned actions have been served upon each Defendant and Defendants hereby accept service of the above captioned complaints pursuant to FRCP 4. Defendants hereby reserve all of their rights, defenses and/or objections to the Complaint with the exception of objecting to service of process which is specifically waived. Nothing herein shall be construed to be an admission or acceptance of service in any action other than the above-captioned actions;

2. Defendants' time to move, answer or otherwise respond to the Complaints is extended without date;

3. Lead plaintiff will file and serve a Consolidated Amended Complaint within 60 days after entry of the Court's order appointing a lead plaintiff and designating lead counsel; and

4. a. Defendants will serve and file their response to the Consolidated Amended Complaint within 60 days of the service thereof;

b. In the event that Defendants move to dismiss the Consolidated Amended Complaint, lead plaintiff will file and serve opposition papers within 60 days of service of the motion; and

c. Defendants will file and serve reply papers, if any, within 45 days after service of lead plaintiff's opposition papers.

5. Any and all pretrial conferences scheduled in the above-captioned actions are hereby adjourned *sine die* until after entry of the Court's order appointing a lead plaintiff and designating lead counsel.

Dated: New York, New York  
July \_\_, 2007

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SO ORDERED:

*[Signature]* 7/23/2007  
U. S. D. J. *m*